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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA DOLORES MORALES BECERRA,
individually; CLARISSA BECERRA,
individually; RAYNA BECERRA,
individually; and RICHARD BECERRA, IN
HIS CAPACITY AS SPECIAL
ADMINISTRATOR FOR THE ESTATE OF
RAYMOND BECERRA, DECEASED;

Plaintiffs,

vs.

WALMART INC., a foreign business entity
dba WALMART; DOE INDIVIDUALS 1-10;
and ROE ENTITIES I-X, inclusive,

Defendants.

Case No.: 2:21-cv-02094-JCM-NJK

**JOINT MOTION TO STAY DEADLINES
[SECOND REQUEST]**

Plaintiffs MARIA DOLORES MORALES BECERRA, CLARISSA BECERRA,
RAYNA BECERRA, and RICHARD BECERRA, IN HIS CAPCAPITY AS SPECIAL
ADMINISTRATOR FOR THE STATE OF RAYMOND BECERRA (hereinafter "Plaintiffs")



1 and Defendant WALMART INC. d/b/a WALMART (hereinafter “Defendant” or “Walmart”), by
2 and through their respective counsel of record, do hereby jointly move the Court, in light of the
3 Parties’ settlement in principle of this matter, to stay all deadlines for thirty (30) days to finalize
4 resolution of all matters in controversy in the above-referenced matter.

5 This is the second such request by either party to extend or modify the schedule. Good
6 cause exists because all matters in controversy between the Parties have been settled. The Parties
7 need additional time to finalize the settlement agreement and file dismissal papers. The Parties
8 believe that entry of a temporary stay will promote judicial economy and preserve the Court’s
9 resources. Accordingly, the Parties respectfully request a 30-day stay for the above-referenced
10 action, including any hearings or deadlines, to permit the Parties time to finalize the agreement
11 and dismiss all pending actions in this Court.
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Wherefore, the Parties respectfully request that the Court enter an order staying all deadlines in this matter for thirty (30) days so that the Parties can finalize their settlement agreement and dismiss this case. With the parties to either file a dismissal of all claims or alternatively to file a status report with the Court within 30 days of the Court's order entering the stay.

DATED this 13th day of May, 2022.

DATED this 13th day of May, 2022.

BAY LAW PERSONAL INJURY

ALVERSON TAYLOR & SANDERS

/s/ Christian A. Miles

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/s/ Patrice Stephenson-Johnson

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IT IS SO ORDERED:

DATED: May 20, 2022


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm BAY LAW PERSONAL INJURY, and that on this 13th day of May, 2022, I electronically served a copy of **JOINT MOTION TO STAY DEADLINES [SECOND REQUEST]** as follows:

☐ By facsimile addressed to the following counsel of record, at the address listed below;

☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☐ By Hand Delivery (ROC); and/or

☒ By Electronic Service through CM/ECF to:

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